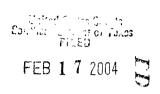


## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION



Michael N. Milby, Clerk

IN RE ENRON CORP. SECURITIES,	§	Michael N. Milby, C
DERIVATIVE & "ERISA" LITIGATION	§	MDL 1446
	§	
	§	CA H-01-3624
MARK NEWBY, et al., vs.	§	AND CONSOLIDATED CASES
ENRON CORP., et al.	§	
	§	
	§	CA H-01-3913
PAMELA M. TITTLE, et al. vs.	§	AND CONSOLIDATED CASES
ENRON CORP., et al.	§	

# MOTION OF PORTLAND GENERAL ELECTRIC COMPANY FOR PROTECTIVE ORDER AS TO DOCUMENTS PRODUCED BY ARTHUR ANDERSEN

Pursuant to Rule 26(c), Fed. R. Civ. P., non-party Portland General Electric Company moves for Protective Order as to documents produced by Arthur Anderson.

A memorandum in support of this motion accompanies this motion.

A proposed order granting the relief requested accompanies this motion.

## **CERTIFICATE OF CONFERENCE**

The undersigned counsel certifies as follows:

By Stipulation Regarding Enron Documents Produced by Arthur Andersen dated October 27, 2003, it was agreed among the principal parties that Motions for Protection as to the Arthur Andersen documents produced to the Document Depository would be filed by February 15, 2004.

#### **MOTION**

Movant acts to protect its own interests and seek to preserve the confidentiality of its confidential information contained in documents produced to the Document



Depository by Arthur Andersen. By way of this Motion, Movant seeks to preserve the confidentiality of its confidential, privileged, and proprietary information and records, subject to further order of this Court and subject to the right of any party or any interested member of the public to challenge the secreting of particular documents. The specific documents for which protection is sought are identified by file names and Bates numbers in the form of order granting the requested relief which accompanies this motion.

### **PRAYER**

WHEREFORE, premises considered, Movant respectfully requests and prays that it be granted the relief set forth in the accompanying proposed Order.

Respectfully Submitted,

Berry Dunbar Bowen

S.B.N. 02721050

S.D. Tex. No. 6177

3014 Brazos Street

Houston, TX 77006

(713) 521-3525

(713) 521-3575 – facsimile

bdbowen@swbell.net - email

ATTORNEY IN CHARGE FOR MOVANT PORTLAND GENERAL ELECTRIC COMPANY

OF COUNSEL

Bradley Westmoreland S.B.N. 21227500 S.D. Tex. No. 3915 4544 Post Oak Place, Suite 350 Houston, TX 77027 (713) 237-0222 (713) 237-0401 – facsimile bwestmore@aol.com - email

## **CERTIFICATE OF SERVICE**

Pursuant to Rule 5(d), Fed. R. Civ. P., I hereby certify that the foregoing motion has been served pursuant to Rule 5(b), Fed. R. Civ. P., addressed as follows:

William S. Lerach, Esq. Milberg Weiss, et al. 401 B. Street, Suite 1700 San Diego, California 92101

Counsel for Newby Plaintiffs

Lynn Lincol Sarko, Esq. Keller Rohrback, L.L.P. 1201 Third Avenue, Suite 3200 Seattle, WA 98101-3052

Counsel for Tittle Plaintiffs

David H. Donaldson, Jr., Esq. George & Donaldson, L.L.P. 114 West 7<sup>th</sup> Street, Suite 1100 Austin, Texas 78701

Attorney-in-Charge for Media Intervenors

Scott D. Lassetter, Esq. 700 Louisiana Street, Suite 1600 Houston, Texas 77002

Attorney-in-Charge for Defendant Enron Corp.

Ethan J. Brown Latham & Watkins LLP 633 West Fifth Street, Suite 4000 Los Angeles, CA 90071-2007

Counsel for Arthur Andersen

Robin C. Gibbs Gibbs & Bruns LLP 1100 Louisiana, Suite 5300 Houston, TX 77002

Counsel for the Outside Directors

Berry Dunbar Bowen